



U.S. Department of Justice

United States Attorney
District of New Jersey

Kathleen P. O'Leary
Assistant U.S. Attorney

970 Broad Street, Suite 700
Newark, NJ 07102

(973)645-2700
Direct Dial (973)645-2841
Fax (973)645-2857

June 17, 2009

Via Electronic and Regular Mail

Hon. Peter G. Sheridan, U.S.D.J.
United States District Court
Clark S. Fisher Building and U.S. Courthouse
402 East State Street, Second Floor
Trenton, New Jersey 07102

Re: U.S. v. Dalnave Navigation Inc. et al.
Crim: No. 09-130

Dear Judge Sheridan:

Upon consent of the parties in the above-captioned matter, we write to respectfully request that Your Honor adjourn tomorrow's hearing on Defendants' motions to take depositions abroad pursuant to Fed. R. Crim. P. 15. In addition, the parties request that Your Honor postpone the filing dates of the pre-trial motions for a two-week period in order to permit all parties to continue to engage in negotiations to resolve the entire matter without necessitating a trial.

Respectfully submitted,

RALPH J. MARRA, JR.
Acting United States Attorney

/s/

By: Kathleen P. O'Leary
Assistant United States Attorney

cc: Michael G. Chalos, Esq. (via email)
Carl Woodward, Esq. (via email)
James A. Plaisted, Esq. (via email)

*1. telephone conference will be held June 25, 2009 at 10:00 AM
my telephone call set up by U.S. Attorney*

SO ORDERED: Peter M. Marra
DATED: 6/18/09